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13 Attorneys for Defendant
 14 ROWLAND MARCUS ANDRADE

15 IN THE UNITED STATES DISTRICT COURT
 16 FOR THE NORTHERN DISTRICT OF CALIFORNIA

18 UNITED STATES OF AMERICA,
 19 Plaintiff,
 20 v.
 21 ROWLAND MARCUS ANDRADE,
 22 Defendant.

Case No. 3:20-CR-00249-RS

**DEFENDANT ANDRADE'S
 ADMINISTRATIVE MOTION TO
 EXCEED PAGE LIMIT FOR MOTION
 FOR NEW TRIAL AND JUDGMENT
 OF ACQUITTAL, AND FOR
 STIPULATED REVISED BRIEFING
 SCHEDULE AND HEARING DATE**

23 Judge: Hon. Richard Seeborg

1 Pursuant to Local Rule 7-11, Defendant Marcus Andrade brings this motion to request
2 that he be permitted to file a post-trial motion in excess of the 25-page limit imposed by Local
3 Rules 7-2(b) and 7-4(b). The motion combines two motions – a Rule 29 motion for judgment of
4 acquittal and a Rule 33 motion for a new trial – which, if filed separately, would permit Mr.
5 Andrade to file a total of 50 pages. Additional pages also are necessary because the motion raises
6 numerous complex evidentiary issues and follows a five-week trial that included admission of
7 hundreds of documents, with many more documents offered, but not admitted. For these reasons,
8 Mr. Andrade requests that the Court permit him to file a 45-page post-trial brief.

9 Defense counsel has conferred with the government. The government takes no position on
10 whether Mr. Andrade should be permitted to file a brief in excess of the page-limit, but has
11 requested that it be provided an extra week to oppose the motion if a 45-page brief is permitted.
12 The parties agree that, in the event that the Court grants Mr. Andrade's motion to file a 45-page
13 post-trial brief, and if the Court approves the parties' agreement to extend by 7 days the
14 government's opposition deadline, the deadline to file a reply, and the hearing, then the revised
15 schedule would be as follows:

Opposition Due on June 11, 2025
Reply Brief due on June 18, 2025
Hearing on June 24, 2025, at 9:30 am

19 See Declaration of Kerrie C. Dent in Support of Administrative Motion to Exceed Page Limit and
20 for Stipulated Revised Briefing Schedule and Hearing Date.

Respectfully submitted,

22 | Dated: May 21, 2025

KING & SPALDING LLP

24 By: /s/ Michael J. Shepard
25 MICHAEL J. SHEPARD
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CINDY A. DIAMOND

Attorneys for Defendant
ROWLAND MARCUS ANDRADE